

# **Exhibit A**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Daniel Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

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Ilya MANYK,

Index No.: 07 CIV 6260

Plaintiff,

-against-

**DEMAND FOR DISCOVERY  
AND INSPECTION**

WESTERN UNION FINANCIAL SERVICES,  
INC., UKRAINIAN FINANCIAL GROUP,  
And JOHN DOE CORPORATION

Defendants  
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**PLEASE TAKE NOTICE**, that pursuant to Rule 26 of the Federal Rules of Civil Procedure, you are hereby required to produce the following in disclosure and for discovery, inspection, photographing, and testing at **THE LAW OFFICES OF GRINBERG & SEGAL, P.L.L.C.**, 111 Broadway, Suite 1306, New York, NY 10006 within twenty (20) days of the date hereof:

1. Please furnish a copy of the Western Union Financial Services, Inc.'s (hereinafter referred to as "Western Union") Agency Reference Guide as described in the Agency Agreement between Western Union Financial Services, Inc. and Ukrainian Financial Group dated December 13, 1996.
2. Please furnish any and all updated Agency Agreements entered into between Western Union and Ukrainian Financial Group.
3. Please furnish a copy of Western Union's Operation Guide as described in the Agency Agreement between Western Union Financial Services, Inc. and Ukrainian Financial Group dated December 13, 1996.
4. Please furnish a copy of all other policies, rules, and regulations as incorporated into the as described in the Agency Agreement between Western Union Financial Services, Inc. and Ukrainian Financial Group dated December 13, 1996.
5. Please furnish a copy of Western Union's security procedures.

6. Please furnish any and all transaction records for Western Union Money Order number 9865448356 purchased on or about July 22, 2004.
7. Please furnish any and all transaction records for Western Union Money Order number 2041382380 purchased on or about July 22, 2004.
8. Please furnish any and all incident reports produced by Western Union, or in the possession of Western Union, regarding Plaintiff, Western Union Money Order number 2041382380, Western Union Money Order number 9865448356, or incidents occurring on July 22-23, 2004 at the Western Union location in Ukrainian Financial Group at 10 Deribasovskaya Street, Odessa, Ukraine.
9. Please furnish any and all records pertaining to internal investigations regarding Plaintiff, Western Union Money Order number 2041382380, Western Union Money Order number 9865448356, or incidents occurring on July 22-23, 2004 at the Western Union location in Ukrainian Financial Group at 10 Deribasovskaya Street, Odessa, Ukraine.
10. Please furnish information as to whether the Ukrainian Financial Group was an approved agent of Western Union as contemplated by the Agency Agreement between Western Union Financial Services, Inc. and Ukrainian Financial Group dated December 13, 1996 as well as any and all records related to the approval process, including the location at 10 Deribasovskaya Street, Odessa, Ukraine.
11. Please furnish information as to whether Western Union had approved any sub-agents working through Ukrainian Financial Group.
12. Please furnish a copy of any and all sub-agency agreements if each individual branch of the Ukrainian Financial Group was a sub-agency.
13. Please furnish copies of all approved advertisement made by Western Union for use in Ukraine as well as any materials related to the approval process.
14. Please furnish receipts for the purchase of promotional materials by Ukrainian Financial Group from Western Union.
15. Please furnish the name and addresses of any other authorized agents authorized by Western Union in Ukraine.
16. Whether Ukrainian Financial Group at 10 Deribasovskaya Street, Odessa, Ukraine was an authorized agent of Western Union and if so, during what time period.
17. Please furnish copies of any and all Western Union policy for dispute resolution.
18. Please furnish a copy of any and all surveillance video from the Western Union location in Ukrainian Financial Group at 10 Deribasovskaya Street, Odessa, Ukraine from July 22-23, 2004.

19. Please furnish the name and address of any company who is the parent company of Western Union Financial Services, Inc.
20. Please furnish any and all agreements between Western Union Financial Services, Inc. and its parent company including, but not limited to, agency agreements, operation agreements, etc.
21. Please provide any and all training records for the individuals employed at the Western Union location in Ukrainian Financial Group at 10 Deribasovskaya Street, Odessa, Ukraine, whether employed by Western Union directly or by an agent, on July 22-23, 2004.
22. Please provide information as to the corporate structure of Western Union Financial Services, Inc. and its parent company, if any.

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand is a continuing demand. In the event any of the above information and/or documents is obtained after service of this demand, or service of a response to said demand, they are to be furnished to the Plaintiff's attorney forthwith.

**PLEASE TAKE FURTHER NOTICE** that your failure to comply herewith will result in an application by the undersigned to the Court for appropriate relief, including sanctions, now or at the time of trial.

Dated: New York, New York  
May 22, 2008

Respectfully submitted,



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Alexander J. Segal, Esq.  
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Attorney for Plaintiff